

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

No: 1:20cr183-1/2/5/6

vs.

ADAM DEAN FOX,  
BARRY GORDON CROFT, JR.,  
DANIEL JOSEPH HARRIS and  
BRANDON MICHAEL-RAY CASERTA,

Defendants.

Before:

THE HONORABLE ROBERT J. JONKER  
U.S. DISTRICT Judge  
Grand Rapids, Michigan  
Wednesday, March 23, 2022  
Excerpt of Jury Trial Proceedings  
Testimony of Matthew Keepers

APPEARANCES:

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19 REPORTED BY: MR. PAUL G. BRANDELL, CSR-4552, RPR, CRR  
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(Excerpt started, 8:33 a.m.)

MATTHEW KEEPERS, GOVERNMENT

having been first duly sworn, testified as follows:

(Witness sworn, 8:33 a.m.)

THE COURT: All right. And please step up. Put the microphone in front of you if you would and then we'll begin.

DIRECT EXAMINATION

BY MR. ROTH:

Q Good morning, sir.

A Good morning.

Q Could I have you start by stating and spelling your complete name, please?

A Matthew Keepers, M-a-t-t-h-e-w, K-e-e-p-e-r-s.

Q Thank you, sir. How old are you?

A Thirty-three years old.

Q Where do you live?

A Alpena, Michigan.

Q How are you employed?

A I work for Verizon.

Q Do you know a person by the name of Adam Fox?

A Yes.

Q Do you see him in the courtroom today?

A Yes.

Q Could you please point him out and identify an article of

1 clothing?

2 A He is the gentleman in the blue shirt with the black tie.

3 Q Thank you. About when is it that you met Adam Fox?

4 A It was approximately 2017, 2018.

5 Q How did you meet him?

6 A I met him through the Michigan Home Guard.

7 Q What is the Michigan Home Guard?

8 A The Michigan Home Guard is a militia of sorts. They  
9 don't -- they don't describe themselves as a militia. They are  
10 a prepper/civil defense/militia organization.

11 Q Were you both members of the Michigan Home Guard at that  
12 time?

13 A Yes.

14 Q Did you both leave the Michigan Home Guard around the same  
15 time?

16 A Yes.

17 Q In speaking to Mr. Fox after you left, did the  
18 circumstances in which you left make him think that you two  
19 were close?

20 A I wouldn't say the circumstances in which we left the Home  
21 Guard made him believe we were close. There were a few other  
22 instances that may have made him believe that we were close.

23 Q All right. But fair to say at the time that you leave the  
24 Home Guard or shortly --

25 MR. GIBBONS: Objection, leading, Your Honor, I think.

1 THE COURT: Well, let him at least phrase the question  
2 first. Go ahead, Mr. Roth.

3 BY MR. ROTH:

4 Q Just to close that issue, you were under the impression  
5 that he thought that you two were close?

6 A At one point, yes.

7 MR. ROTH: Could we please play Exhibit 66?

8 THE COURT: You have to reboot the audio it sounds  
9 like.

10 (Audio started, 8:36 a.m.)

11 (Audio stopped, 8:37 a.m.)

12 BY MR. ROTH:

13 Q All right. So that recording is from June 20th, 2020. At  
14 the beginning you heard Mr. Fox refer to you as Keepers?

15 A Yes.

16 Q Was there a time after you both left the Michigan Home  
17 Guard in which Adam Fox got back in touch with you?

18 A Yes.

19 Q Was that over FaceBook Messenger?

20 A Yes. Initially.

21 Q And if you look at the binder in front of you, the page  
22 that is open, Proposed Exhibit 444, is that a fair and accurate  
23 copy of some of those FaceBook messages?

24 A Looks like it. Yes.

25 Q And those are messages between you and Adam Fox?

1 A Yes.

2 MR. ROTH: Your Honor, I'd move for the admission of  
3 Proposed Exhibit 444?

4 MR. BLANCHARD: Object on the basis of hearsay as to  
5 Mr. Keepers' statements.

6 THE COURT: As to Mr. Keepers' statements?

7 MR. BLANCHARD: Yes.

8 THE COURT: I'll overrule and it can be admitted.

9 MR. ROTH: Thank you, Your Honor.

10 BY MR. ROTH:

11 Q If we can put that on the screen, please? Thank you. And  
12 if we could start with the first box? Thank you.

13 So these messages are from June 23rd, 2020, three days  
14 after the recording we just heard?

15 A Yes.

16 Q And this first message Fox tells you, we are a militia  
17 group. There is mission statement but won't be no egos or  
18 bullshit like MHG. No disciplinary issues. No fucking drama.  
19 If we argue we argue. We'll always work shit out. End of the  
20 day we're going to be a family bro. When the time comes we'll  
21 all fight together.

22 MHG, is that Michigan Home Guard?

23 A Yes.

24 Q Could we move to the second message, please? The second  
25 box.

1 Mr. Fox sent you, and anything is up for discussion,  
2 lol, but we need keep things secure especially when we want to  
3 talk crazy. This unit is being built with the sole purpose of  
4 taking action.

5 Did you understand what Mr. Fox meant when he said  
6 when we want to talk crazy?

7 A I had an idea.

8 Q All right. And when he talked about keeping things secure,  
9 in your experience what does secure mean?

10 MR. BLANCHARD: I would object as to speculation.  
11 It's not for this witness to interpret Mr. Fox's statements.  
12 That's for the jury.

13 THE COURT: You may want to add more foundation if  
14 that was something they did, for example, in the Home Guard  
15 together or otherwise, because I think Mr. Blanchard's point is  
16 well taken otherwise.

17 BY MR. ROTH:

18 Q Is message security something that was the issue in the  
19 Michigan Home Guard when you were there with Mr. Fox?

20 A It was discussed with a few members of moving things over  
21 to Signal, which is a secure point-to-point encrypted text  
22 messaging app as opposed to using FaceBook because anyone can  
23 be FaceBook messages.

24 Q So generally speaking, when we talk about moving things to  
25 encrypted chats or encrypted apps, what does secure mean?

1 A Secure means the only people who can read it are the people  
2 it's intended for.

3 Q Thank you. If we could move to the next box, please?

4 Adam Fox sent you, we gonna have some fun, live  
5 dangerously and do some cowboy shit. And then he asked, you  
6 game? What did you understand him to mean when he asked if you  
7 are game?

8 MR. BLANCHARD: I would object as to speculation.

9 THE COURT: I think what the witness can say is what  
10 he interpreted, because he had -- if he drew a conclusion, and  
11 you can add that foundation if you want, Mr. Roth.

12 MR. ROTH: I think, Your Honor, based on the fact that  
13 it's conversation between the two of them, a question asked by  
14 the Defendant, he can testify with this foundation as to how he  
15 received that question.

16 THE COURT: How he interpreted it at the time. I  
17 think if he had an interpretation he can answer that.

18 MR. ROTH: Thank you, Your Honor.

19 BY MR. ROTH:

20 Q Did you understand what Mr. Fox was asking you?

21 A He was asking me if I was on board to have fun. To try to  
22 join his group to see what was going on.

23 Q So shortly to join his group or his new militia?

24 A Yes.

25 Q All right. He goes on. Excuse me. And then how do you



1       reply at that time?

2       A     I replied, yeah, I'm game.

3       Q     Adam Fox went onto say, I promise you this will not be a  
4       social club. We don't back the blue or any alphabet agencies  
5       or any political parties. We are patriots and our only concern  
6       is upholding the constitution, bro. Are you familiar with the  
7       term back the blue?

8       A     Yes.

9       Q     What does that mean?

10      A     It means support law enforcement.

11      Q     And he said that his group does not do that?

12      A     Correct.

13      Q     Are you familiar with the term alphabet agencies?

14      A     Yes.

15      Q     What does that mean?

16      A     It's any government agency that traditionally uses three  
17      letter acronyms. NSA, DIA, CIA, FBI, et cetera.

18      Q     All right. So additionally you indicate, yeah, I'm game.  
19      Did you ever end up joining his militia?

20      A     No.

21      Q     Did you sort of blow him off after this?

22      A     Yes. I let him know that due to time constraints and  
23      distance constraints it wasn't something that I would be able  
24      to commit to.

25      Q     After that did Fox ever contact you and ask for something?

1 A Shortly after.

2 MR. ROTH: We can take that exhibit down.

3 BY MR. ROTH:

4 Q The further communication, was that on-line or by phone?

5 A Via phone.

6 Q And what did he ask you for when he called?

7 A After a while he asked me if I could either procure him  
8 explosives, build him explosives or teach him how to build  
9 explosives.

10 Q And you said shortly after the June 23d message on FaceBook  
11 that we just looked at?

12 A Correct.

13 Q In that recording that we heard, at the beginning there was  
14 talk about bakers and cupcakes and things like that. Are you  
15 familiar with that terminology?

16 A Yes.

17 Q Did you have some, excuse me, background or experience in  
18 making explosives?

19 A Yes.

20 Q Could you describe that for the jury, please?

21 A I've worked with various explosives experts throughout  
22 civilian fields. I was trying to get into La Farge, which is a  
23 quarry, as a blaster. That didn't work out so now I work for  
24 Verizon.

25 Q Did Adam Fox know that you had experience with explosives?

1 A Most people in MHG did. Yes.

2 Q Is that something that you had talked about with Fox  
3 before?

4 A Not necessarily Adam Fox specifically but it was something  
5 that had been discussed.

6 Q Tell us what you mean by that?

7 A So there was a large discussion chat that was open to all  
8 members of the MHG for a period of time that everything was  
9 discussed from gear setup --

10 MR. BLANCHARD: I would object as to hearsay what was  
11 discussed in a large chat in another militia group.

12 THE COURT: Yeah. I think that's right. Do you have  
13 another foundation to go for that? Otherwise, I think we are  
14 getting far afield.

15 MR. ROTH: I can ask a foundational question, Your  
16 Honor.

17 BY MR. ROTH:

18 Q Was Adam Fox a member of that chat group at the time these  
19 things were discussed?

20 A Yes.

21 Q So he would have knowledge of the things that you  
22 discussed?

23 A Yes.

24 Q All right. So with that, let me ask more specifically, did  
25 you talk on that chat group in which Adam Fox was a member

1 about your experience and knowledge with explosives?

2 A Yes.

3 Q In that group and otherwise, did you use code words for  
4 explosives?

5 A Yes.

6 Q What code words did you use for explosives?

7 MR. BLANCHARD: Object as to hearsay. It's an  
8 out-of-court statement.

9 THE COURT: I think the background of the witness  
10 allows him to talk about it, and he has already laid foundation  
11 for the discussions he was having. He is now asked to recount  
12 them. Go ahead.

13 MR. ROTH: Thank you, Your Honor.

14 BY MR. ROTH:

15 Q What code words were used in that chat room in which Adam  
16 Fox was a member to discuss explosives?

17 A The phrase cupcakes was used for mentioning of explosives.

18 Q And was there a code word mentioned for who -- a person who  
19 makes explosives?

20 A By nature of cupcakes the baker became the cup -- the  
21 explosives maker.

22 Q In June of 2020 or thereabouts when he -- when Adam Fox  
23 contacts you and asks for explosives for you to either make  
24 them or procure them for him, did he tell you what he needed  
25 them for?

1 A No.

2 Q All right. How did you respond when he asked you for an  
3 explosive?

4 A I told him that there was no way that was possible due to  
5 travel constraints, time constraints, and whatever he was  
6 planning just seemed like a really bad idea that I didn't want  
7 to be involved in.

8 Q All right. Have you been involved in other militias and  
9 such groups going back?

10 A Only the Michigan Home Guard.

11 Q In your time with the Michigan Home Guard were you familiar  
12 with a person by the name of Barry Croft?

13 A The name has popped up multiple times throughout my time  
14 with the Michigan Home Guard.

15 Q And is that something that you were familiar with, his  
16 website or his FaceBook page on-line?

17 A No. Just the name.

18 Q And was that in the context of III% groups?

19 A Yes.

20 Q What do you know the III% groups to be?

21 A So I understand III%er groups are the new -- the new -- I  
22 am going to not say extremists, but the new patriot movement.  
23 The thought being in the American revolution III% of the  
24 Americans fought the British and won.

25 Q Was Barry Croft a local person or national person?

1 A National.

2 MR. ROTH: I have nothing else, Your Honor. Thank  
3 you.

4 THE COURT: All right. Go to Mr. Gibbons.

5 MR. GIBBONS: Thank you, Your Honor.

6 CROSS EXAMINATION

7 BY MR. GIBBONS:

8 Q Good morning, Mr. Keepers.

9 A Good morning, sir.

10 Q Let me explore a little bit of your relationship with Adam  
11 Fox in the Home Guard. The Home Guard I think you said was a  
12 prepper outfit?

13 A It was an undefined organization. It was based primarily  
14 as a prepper organization/militia/civil defense group.

15 Q Okay. And the prepping would be for a social breakdown, is  
16 that the deal?

17 A The prepping was for any sort of disaster that could  
18 happen, whether it be socioeconomic breakdown, natural  
19 disaster, large scale power outage. It wasn't a defined if  
20 this then this. It was a, hey, we are going to teach you how  
21 to can your own food, basic medical, how to set up and build  
22 fires in different situations, things of that nature.

23 Q Okay. With respect to the Home Guard, is it fair to say  
24 that the majority of the social contact people enjoyed as Home  
25 Guard members -- and I understand it's a loose affiliation,

1 mostly done on-line with FaceBook and chat groups?

2 A The vast majority of it to an extent.

3 Q Yes. And then occasionally there would be social  
4 gatherings, true?

5 A Yes.

6 Q But those were not regular and consistent, true?

7 A It kind of depended on the area you were in. Some areas  
8 were more active in their social and their actual physical  
9 meet-ups than the on-line, but the majority of people  
10 interacted on-line, yes.

11 Q Correct. And then I probably suppose it's like any other  
12 organization, when there are meet-ups you kind of have a core  
13 group that tend to go?

14 MR. ROTH: Your Honor, I am going to object to the  
15 relevance. I think we are getting beyond the foundation that's  
16 necessary with this witness.

17 THE COURT: Well, I'll let him go a little ways since  
18 he met -- he testified that he met Mr. Fox through the Home  
19 Guard and you asked him questions about that, so I think we'll  
20 go a little ways. Go ahead.

21 BY MR. GIBBONS:

22 Q But there are quite a few people in the Home Guard?

23 A Yes.

24 Q And the vast majority are probably just keyboard warriors,  
25 correct?

1 MR. ROTH: Your Honor, I object to speculation.

2 THE COURT: He was there and at some point we'll have  
3 to get more foundation if we go into any kind of detail, but as  
4 a generic matter I'm not sure it's anything different from what  
5 we heard on direct. Go ahead.

6 BY MR. GIBBONS:

7 Q Moving forward with Adam Fox, he left the Home Guard at  
8 about the same time you did, true?

9 A Yes.

10 Q Okay. Adam Fox next reaches out to you on FaceBook  
11 Messenger, correct?

12 A Yes.

13 Q Do you consider FaceBook Messenger to be secure?

14 A No.

15 Q Okay. Were you on Signal with Adam Fox?

16 A I do not believe he was on Signal. I'm -- all of my text  
17 messages are routed through Signal, so if he was using Signal  
18 at that time then yes. If not then no.

19 Q But you didn't communicate with him on Signal, did you?

20 A No.

21 Q And you did not communicate with him on Wire?

22 A No.

23 Q Jim Macintosh was at the Vac Shack meeting where your name  
24 came up.

25 A Okay.



1 Q Do you know that guy?

2 A Yes.

3 Q And how do you know that guy?

4 A I met him through the Home Guard.

5 Q Okay. And he is familiar with your background, true?

6 A Yes.

7 Q And he knows that you had experience with explosives?

8 A Yes.

9 Q Did you have the opportunity to come to the Vac Shack in  
10 June of 2020?

11 A No.

12 Q So you weren't at the June 20th meeting, correct?

13 A Correct.

14 Q Because you were talked about at the meeting, true?

15 A Correct.

16 Q And you didn't come a few days later on a Monday for a  
17 meeting with Adam Fox, did you?

18 A No.

19 Q And you could have had an opportunity to maybe have dinner  
20 with Adam and his girlfriend at one point, is that right?

21 A Yes.

22 Q And you declined that invitation?

23 A Correct.

24 Q You did not meet with him?

25 A Correct.

1 Q You did not talk with him?

2 A Correct.

3 Q Did you ever talk with Adam Fox on the phone?

4 A Yes.

5 Q How many times?

6 A Approximately 10.

7 Q Okay. In those phone calls did you agree to give Adam Fox  
8 or provide him with explosives?

9 A No.

10 Q In fact, isn't it true you never agreed to give -- provide  
11 Adam Fox with explosives, correct?

12 A Correct.

13 Q Have you ever been to the Wolverine Watchmen trainings in  
14 Munith, Michigan?

15 A No.

16 Q Have you been to any events involving the III%ers in  
17 Wisconsin or Ohio?

18 A No.

19 Q Is it true that in your communications with Adam Fox you  
20 didn't hear anything about kidnapping the Governor?

21 MR. ROTH: Objection.

22 THE COURT: I'll sustain that, yes, definitely.

23 MR. GIBBONS: I have no further questions, Your Honor.

24 THE COURT: Okay. Ms. Kelly?

25 CROSS EXAMINATION

1 BY MS. KELLY:

2 Q Good morning, sir.

3 A Good morning.

4 Q You've testified that you met Adam Fox, right?

5 A Yes.

6 Q And you heard about Barry Croft on line, correct?

7 A Yes.

8 Q You never heard about Daniel Harris, correct?

9 A No.

10 Q You don't know Daniel Harris?

11 A No.

12 MS. KELLY: I have nothing further. Thank you.

13 THE COURT: All right. Mr. Hills?

14 MR. HILLS: No questions. Thank you.

15 THE COURT: Mr. Blanchard?

16 MR. BLANCHARD: Thank you.

17 CROSS EXAMINATION

18 BY MR. BLANCHARD:

19 Q Good morning.

20 A Good morning.

21 Q So we have this June 23rd FaceBook conversation with  
22 Mr. Fox, right?

23 A Yes.

24 Q Mr. Croft wasn't involved in that, right?

25 A Correct.

1 Q You never talked to Mr. Croft on FaceBook?

2 A No.

3 Q Never via FaceBook Messenger?

4 A No.

5 Q Never via Signal?

6 A No.

7 Q Never via Wire?

8 A No.

9 Q Never via Threema?

10 A No.

11 Q Never via text message?

12 A I have never talked to him at all.

13 Q Not in any way?

14 A In any way.

15 Q And you never met him in person?

16 A Correct.

17 Q First time you have seen Mr. Croft in your life is in this  
18 courtroom?

19 A Yes.

20 MR. BLANCHARD: Pass the witness.

21 THE COURT: Any redirect?

22 MR. ROTH: None, Your Honor. Thank you.

23 THE COURT: All right. Thank you.

24 (Witness excused, 8:52 a.m.)

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## REPORTER'S CERTIFICATE

I, Paul G. Brandell, CSR-4552, Official Court Reporter for the United States District Court for the Western District of Michigan, appointed pursuant to the provisions of Title 28, United States Code, Section 753, do hereby certify that the foregoing is a full, true and correct transcript of an excerpt from the proceedings had in the within entitled and numbered cause on the date hereinbefore set forth; and I do further certify that the foregoing transcript has been prepared by me or under my direction.

/s/ Paul G. Brandell

Paul G. Brandell, CSR-4552, RPR, CRR

U.S. District Court Reporter

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